

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**~ vs ~**

**RAUL TORRES,**

**Defendant.**

**CASE NO.: 1:19-CR-00390**

**JUDGE DONALD C. NUGENT**

**UNOPPOSED MOTION TO CONTINUE  
SENTENCING HEARING TO A DATE  
AFTER FEBRUARY 10, 2020**

Now comes the Defendant, **Raul Torres**, by and through his undersigned counsel, and respectfully requests this Honorable Court issue an Order continuing the Sentencing Hearing, presently scheduled for February 4, 2020, to a date after February 10, 2020 for the following reasons.

Pursuant to Paragraph 4a of the Plea Agreement, the Government and the Defendant agreed that Defendant would forfeit \$1,037,086.00, which was to be paid prior to or at Sentencing. To date, Defendant made good faith efforts and has been able to secure more than \$962,000.00 of the funds. These funds are in the possession of the undersigned. Defendant has been diligent in his efforts to secure the full \$1,037,086.00 by liquidating real property assets and is confident he will be in possession of the full amount by February 10, 2020.

The above has been verified with Innovative Title and Escrow by letter dated January 31, 2020 and provided to the U.S. Attorney's office.

The U.S. Attorney's office is in agreement that a continuance after February 10, 2020 is in the interests of Justice.

**WHEREFORE**, for the foregoing reasons, it is respectfully requested that this Honorable Court issue an Order continuing the Sentencing Hearing, presently scheduled for February 4, 2020, to a date after February 10, 2020. The Government has been consulted on this motion and does not object.

Respectfully submitted,

/s/ - Michael J. Goldberg

**THE GOLDBERG LAW FIRM**

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Counsel for **DEFENDANT RAUL TORRES**

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 31<sup>st</sup> day of January, 2020, a copy of the foregoing has been filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ - Michael J. Goldberg

**MICHAEL J. GOLDBERG, ESQ.**